

From: [Stubbs, Genevieve](#)
To: [Referred to](#); [Scott, Debra \(IG/M/PPSP\)](#)
Subject: Review of Spring Semiannual Report to the Congress
Date: Wednesday, April 20, 2016 11:53:11 AM

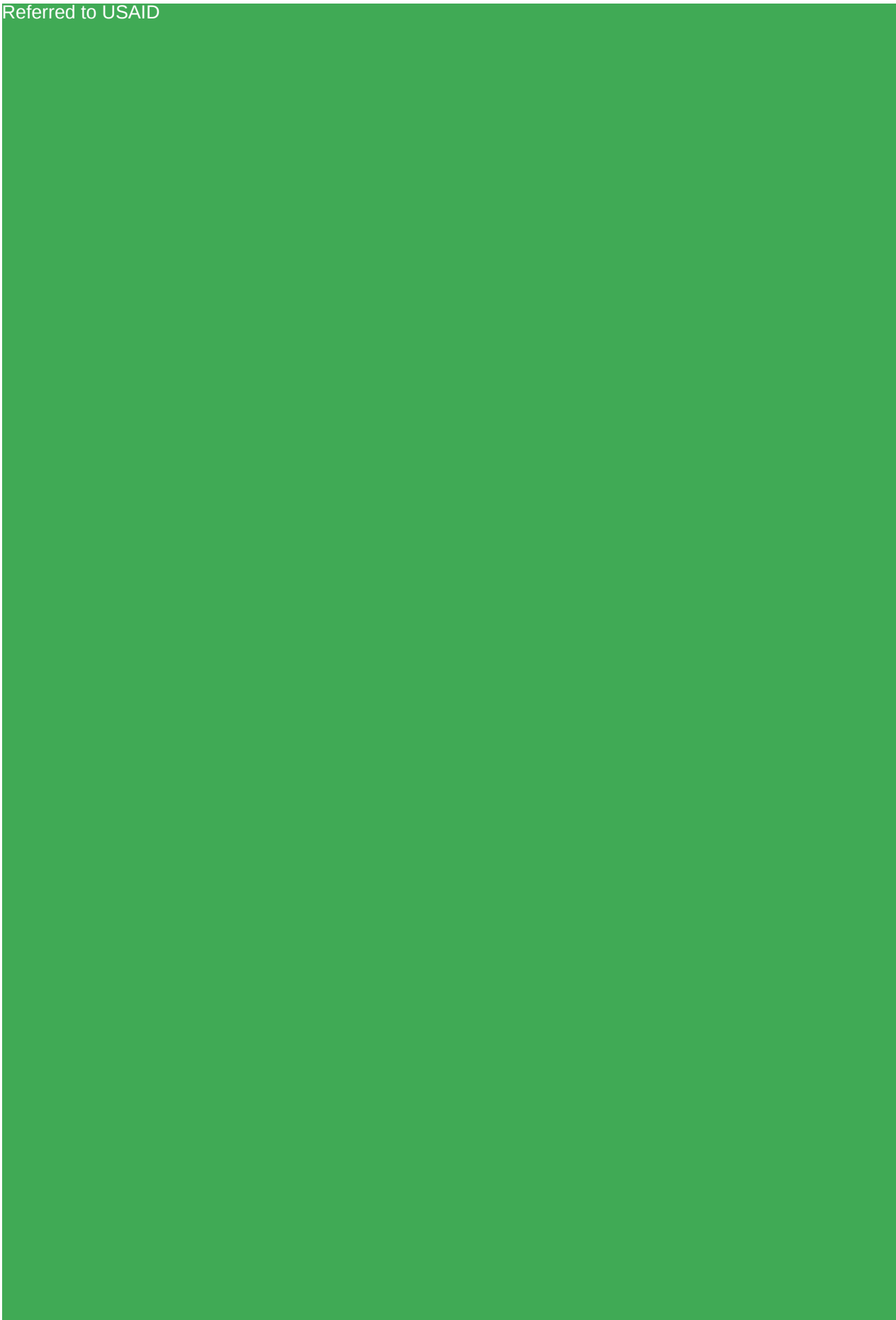
Ms. Alridge & Ms. Scott:

Thank you for the opportunity to review the draft Semiannual Report to the Congress from the USAID OIG, October 1, 2015 – March 31, 2016. Our comments are listed below.

- On page 22, there is a table listing “Open and Unimplemented Recommendations.” It indicates that there are **two** such recommendations for OPIC. However, there are **zero** such recommendations for OPIC at this time. See below for information re correcting this figure. The single “open” recommendation was No. 3. However, in an email dated April 12, 2016, from T. Hart to G. Stubbs, the OIG acknowledged a management decision for this recommendation.
- On page 183, there is a typo in the citation at the end of the second paragraph. The relevant Consolidated Appropriations Act is “2015 (P.L. 113-235)”. In addition, in item (1) in that paragraph, it is more precise to simply state that OPIC was directed to “(1) enter into an agreement with USAID OIG”.
- Beginning on page 185, in the table entitled “Reports Over 6 Months Old With No Management Decision”, one item is listed. However, in an email dated April 12, 2016, from T. Hart to G. Stubbs, the OIG acknowledged a management decision for this recommendation. Therefore, this table should be revised to indicate that there are no such reports.
- Beginning on page 185, in the table entitled “Management Decisions With Which the Inspector General Disagrees”, three items are listed. These items have been reproduced in the table below along with the original OIG recommendation, OPIC’s prior written response, and any OPIC’s requested clarifications/corrections to the current draft report.

OIG AUDIT RECOMMENDATION	OPIC RESPONDED TO OIG	OIG REPORT TO CONGRESS	REVISION REQUESTED
Referred to USAID			

Referred to USAID



Referred to USAID



Referred to USAID

Referred to USAID



Genevieve G. Stubbs

Sr. Administrative Counsel/ADAE0

Overseas Private Investment Corporation

1100 New York Ave. NW

Washington, DC 20527 (b) (6)

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Referred to USAID



From: Stubbs, Genevieve [mailto:(b) (6)]

Sent: Tuesday, April 12, 2016 2:11 PM

To: Hart, Timothy (Frankfurt/RIG)

Cc: Heimert, Kimberly; Day, Barbara; Alford, Cameron

Subject: RE: Follow Up On Recommendation Disagreements -RIG/Frankfurt - 8-OPC-15-002-P

Importance: High

Tim:

See below and attached.

Insurance Dept.: Adopted 3/24/16. See attached.

SMEF & Structured Finance Depts. Adopted changes to existing procedures as of 11/13/2015. Key changes were moving level of approval up to VP (SMEF) or Managing Director (SF), and requirement for documentation of comparison of consultant who bid on the job or justification for doing a sole source engagement.

Genevieve G. Stubbs

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Referred to USAID

From: Stubbs, Genevieve [mailto:(b) (6)]
Sent: Monday, April 11, 2016 4:31 PM
To: Hart, Timothy (Frankfurt/RIG)
Subject: FW: Follow Up On Recommendation Disagreements -RIG/Frankfurt - 8-OPC-15-002-P
Importance: High

See below. I sent the original to your old email address and it bounced. My mistake.

Genevieve G. Stubbs

*Sr. Administrative Counsel/ADAEO
Overseas Private Investment Corporation
1100 New York Ave. NW
Washington, DC 20527 (b) (6)
O: (b) (6)*

From: Stubbs, Genevieve
Sent: Monday, April 11, 2016 10:30 AM
To: 'Hart, Timothy' <(b) (6)>
Subject: Follow Up On Recommendation Disagreements -RIG/Frankfurt - 8-OPC-15-002-P
Importance: High

Tim:

Thank you for forwarding the email from Ms. Baxter re what will be said in the report to Congress.

However, we are concerned re **item no. 3**. She stated that it will be reported in the table of "Reports Over 6 Month Old With No Management Decision." As was stated in our response to you, we sent out an agency-wide communication re the policy and each of the line departments reviewed their own policies and procedures to determine what change needed to be made. Those that needed to be changed were changed. One department's existing procedures (IFD) already contained language that ensures competitive processes would be used.

We are somewhat at a loss to understand what else management could or should be doing at this point to make a "management decision" that will be reported as such to Congress. Could you please provide some additional guidance re this?

Much appreciated.

Genevieve G. Stubbs

*Sr. Administrative Counsel/ADAEO
Overseas Private Investment Corporation
1100 New York Ave. NW
Washington, DC 20527 (b) (6)
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From: [Stubbs, Genevieve](#)
To: [Hart, Timothy \(Frankfurt/RIG\)](#)
Cc: [Heimert, Kimberly](#); [Day, Barbara](#); [Alford, Cameron](#)
Subject: RE: Follow Up On Recommendation Disagreements -RIG/Frankfurt - 8-OPC-15-002-P
Date: Tuesday, April 12, 2016 8:10:46 AM
Attachments: [TW 1.pdf](#)
[05. Finance Program Procedure for Retaining Non-FAR Consultants - FINAL \(1\).docx](#)
Importance: High

Tim:

See below and attached.

Insurance Dept.: Adopted 3/24/16. See attached.

SMEF & Structured Finance Depts. Adopted changes to existing procedures as of 11/13/2015. Key changes were moving level of approval up to VP (SMEF) or Managing Director (SF), and requirement for documentation of comparison of consultant who bid on the job or justification for doing a sole source engagement.

Genevieve G. Stubbs

Sr. Administrative Counsel/ADAE0

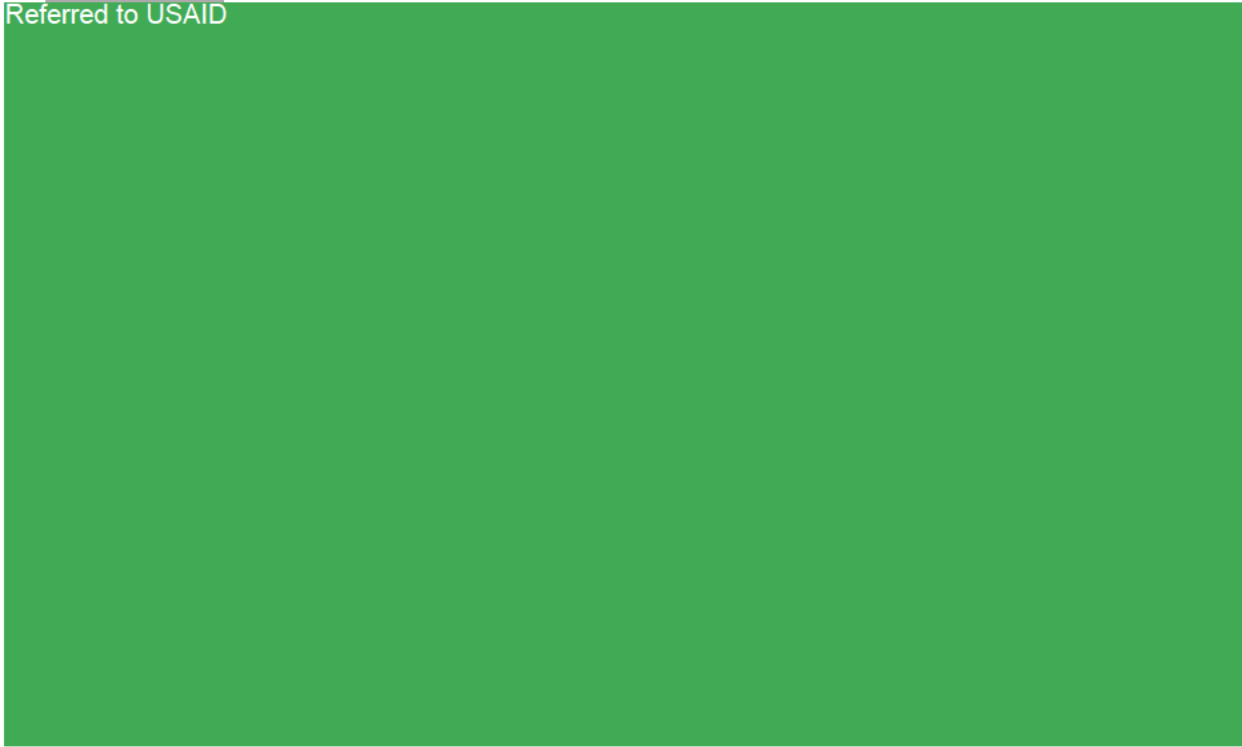
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Washington, DC 20527 (b) (6)

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From: Stubbs, Genevieve [[mailto:](#)(b) (6)]

Sent: Monday, April 11, 2016 4:31 PM

To: Hart, Timothy (Frankfurt/RIG)

Subject: FW: Follow Up On Recommendation Disagreements -RIG/Frankfurt - 8-OPC-15-002-P

Importance: High

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Genevieve G. Stubbs

Sr. Administrative Counsel/ADAE0

Overseas Private Investment Corporation

1100 New York Ave. NW

Washington, DC 20527 (b) (6)

O: (b) (6)

From: Stubbs, Genevieve

Sent: Monday, April 11, 2016 10:30 AM

To: 'Hart, Timothy' <(b) (6)>

Subject: Follow Up On Recommendation Disagreements -RIG/Frankfurt - 8-OPC-15-002-P

Importance: High

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We are somewhat at a loss to understand what else management could or should be doing at this point to make a "management decision" that will be reported as such to Congress. Could you please provide some additional guidance re this?

Much appreciated.

Genevieve G. Stubbs

Sr. Administrative Counsel/ADAE0

Overseas Private Investment Corporation

1100 New York Ave. NW

Washington, DC 20527 (b) (6)

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From: [Stubbs, Genevieve](#)
To: [Hart, Timothy \(Frankfurt/RIG\)](#)
Cc: [Heimert, Kimberly](#); [Day, Barbara](#)
Subject: RE: Follow up on recommendation disagreements
Date: Tuesday, March 29, 2016 1:56:16 PM

Tim:

Here is a complete table of responses to the four items you asked about re OPIC's additional actions.

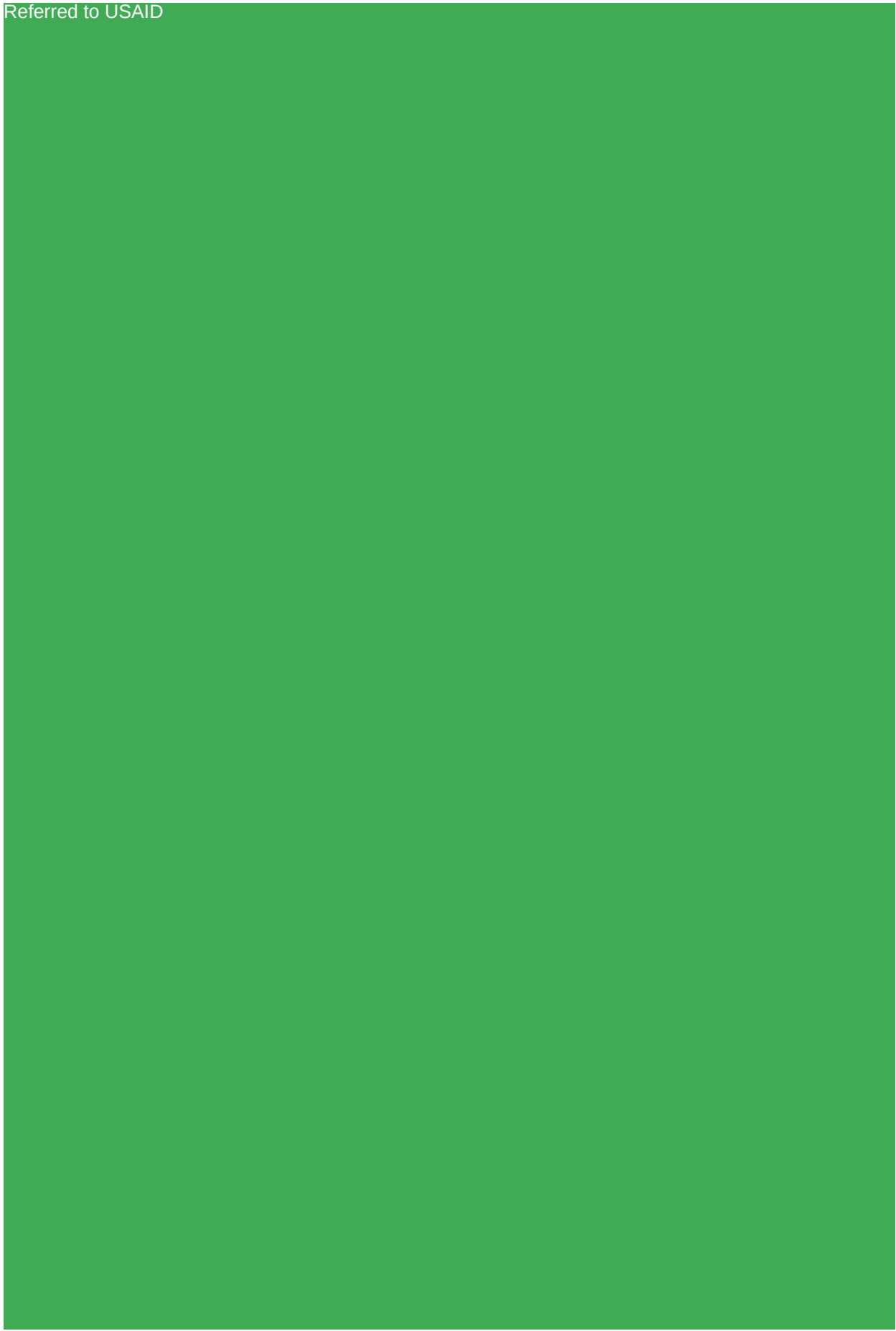
Please let me know if you need additional information.

OIG AUDIT RECOMMENDATION	OPIC RESPONDED TO OIG	OIG CONCLUSION	RESPONSE
Referred to USAID			

Referred to USAID



Referred to USAID



Referred to USAID

Referred to USAID



Genevieve G. Stubbs

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From: [Littlefield, Elizabeth](#)
To: [Calvaresi-Barr, Ann \(IG/IO\)](#)
Cc: [Schmidt, Andrew \(IG/IO\)](#); [Richardson, Ellen \(IG/IO\)](#)
Subject: RE: Our meeting next week
Date: Tuesday, March 29, 2016 1:32:25 PM

Ann,

Thanks very much for reaching out. In fact, I too had intended to do so but I was also travelling (in West Africa). So thanks for your email. I think the team would just be glad to hear your perspective and thoughts on how best to work together and how to ensure an efficient, effective and collaborative working relationship at all levels. I look forward to talking directly to you on Wednesday.

Best,

Elizabeth

Elizabeth L. Littlefield

President & CEO

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<https://oig.usaid.gov/>

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From: Stubbs, Genevieve [mailto:(b) (6)]
Sent: Monday, March 28, 2016 12:00 PM
To: Dempsey, Melinda (IG/A/AIG)
Subject: RE: Procedures for Audit inquiries

Are you available by phone at 3:30 today? If so, what is the best number to reach you?

Genevieve G. Stubbs

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1100 New York Ave. NW
Washington, DC 20527 (b) (6)
O: (b) (6)*

Referred to USAID



From: Stubbs, Genevieve [mailto:(b) (6)]
Sent: Thursday, March 24, 2016 3:43 PM
To: Dempsey, Melinda (IG/A/AIG)
Cc: Lokos, Nathan (IG/A/AIG); Byrne, Christine (IG/A/AIG)
Subject: RE: Procedures for Audit inquiries

Melinda:

Thank you for getting in touch. Kimberly will not be available tomorrow. I will work with her to find a time for next week.

Genevieve G. Stubbs

*Sr. Administrative Counsel/ADAE0
Overseas Private Investment Corporation
1100 New York Ave. NW
Washington, DC 20527 (b) (6)*

O: (b) (6)
Referred to USAID



From: [Heimert, Kimberly](#)
To: [Goldfluss, Lisa \(IG/IO\)](#)
Cc: [Stubbs, Genevieve](#); [Dempsey, Melinda \(IG/A/AIG\)](#); [Lokos, Nathan \(IG/A/AIG\)](#); [Trujillo, Catherine \(IG/IO\)](#); [Day, Barbara](#)
Subject: RE: OPIC MOU 2015
Date: Thursday, February 18, 2016 6:28:50 PM

We were not aware of that. We were told that the FY2016 performance audit would cover a different topic entirely. As you know, we agreed that the FISMA audit should start earlier this year, before the FY2016 was signed, provided that the costs to OPIC did not exceed the previous year's budget. We would have been happy to agree to a similar arrangement for the Chile performance audit.

On a different topic, to ensure that we understand, and are able to respond in a timely manner to, your needs and requests, it would be helpful if we could receive an estimated timeline of the audits currently underway and any new audits that you intend to undertake under the FY2016 MOU. As agreed between our principals, and as reflected in the FY2016 MOU, I know that USAID OIG wants to be "sensitive to OPIC's business cycle".

Thank you,

Kimberly

Kimberly Heimert

Vice President and General Counsel

OVERSEAS PRIVATE INVESTMENT CORPORATION

1100 New York Ave, NW

Washington DC 20527

O: +(b) (6)

M: +(b) (6)

(b) (6)

Referred to USAID

From: Heimert, Kimberly [[mailto:\(b\) \(6\)](#)]

Sent: Thursday, February 18, 2016 12:43 PM

To: Goldfluss, Lisa (IG/IO)

Cc: Stubbs, Genevieve; Dempsey, Melinda (IG/A/AIG); Lokos, Nathan (IG/A/AIG); Trujillo, Catherine (IG/IO)

Subject: Re: OPIC MOU 2015

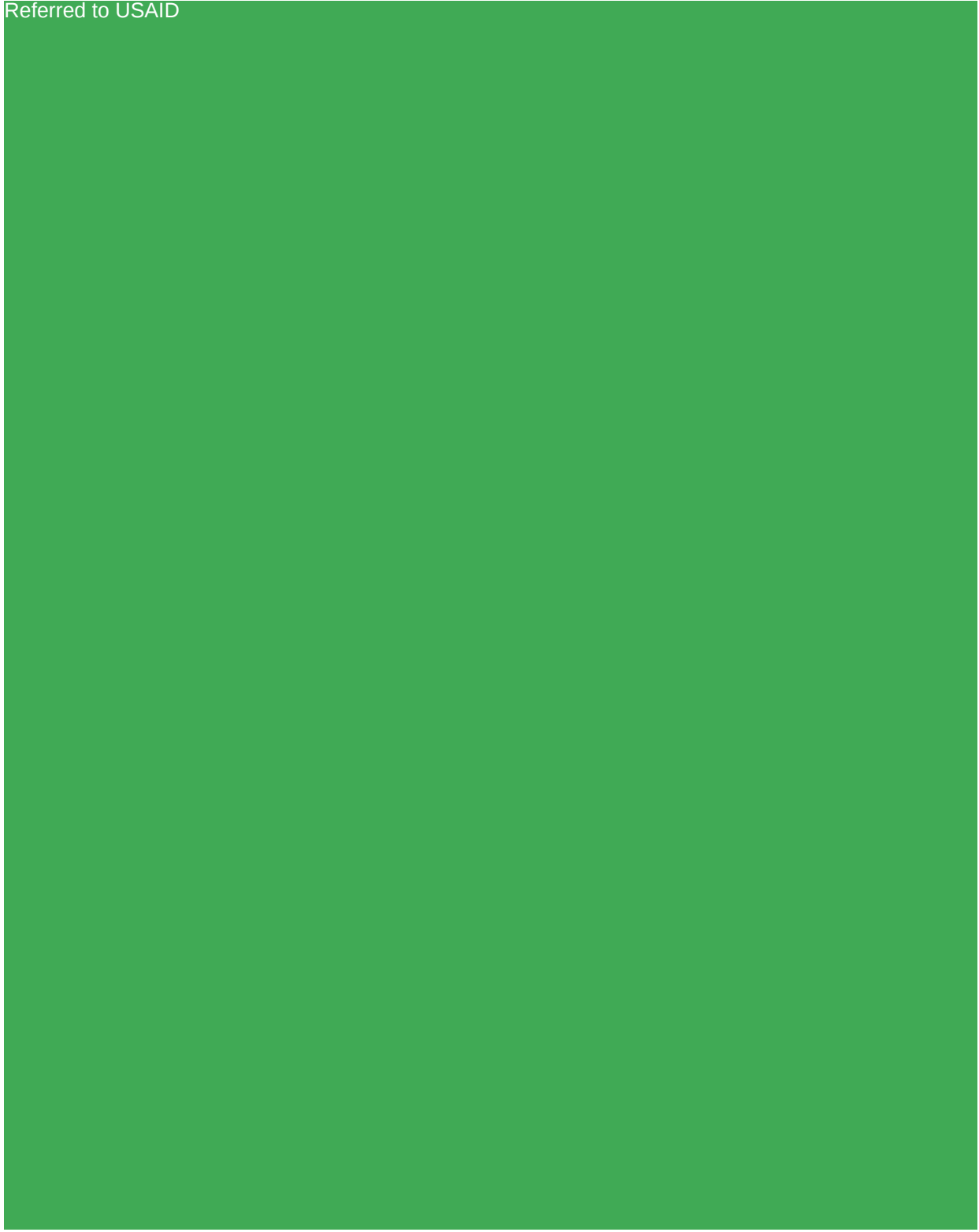
I note that the Chilean audit is under the FY2015 MOU and, therefore, the FY2016 MOU should have no impact on that audit.

That being said, the signed MOU will be sent to you today.

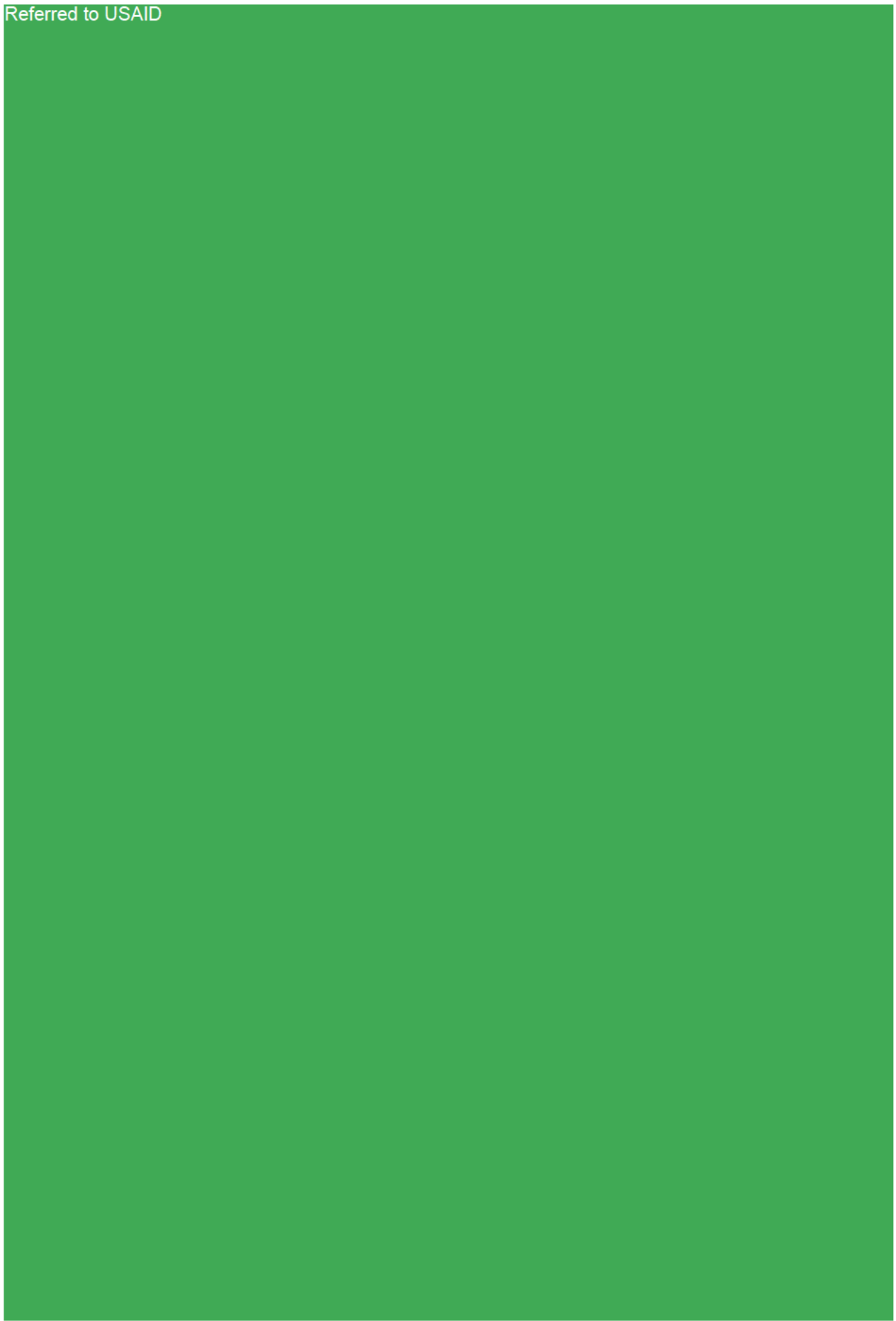
Kimberly

Sent from my iPhone

Referred to USAID



Referred to USAID



Referred to USAID



From: Heimert, Kimberly [[mailto:\(b\) \(6\)](#)]
Sent: Friday, February 05, 2016 10:10 PM
To: Goldfluss, Lisa (IG/IO)
Cc: Stubbs, Genevieve; Dempsey, Melinda (IG/A/AIG); Lokos, Nathan (IG/A/AIG)
Subject: Re: OPIC MOU 2015 relationship between parties

Lisa:

Perhaps it best for you to propose whatever language you think is appropriate. It seems that communicating with concepts is not effective.

Kimberly

Sent from my iPhone

Referred to USAID



-----Original Message-----

From: Heimert, Kimberly [(b) (6)]
Sent: Friday, February 05, 2016 08:34 PM Eastern Standard Time
To: Goldfluss, Lisa (IG/IO)
Cc: Stubbs, Genevieve; Dempsey, Melinda (IG/A/AIG); Lokos, Nathan (IG/A/AIG)
Subject: RE: OPIC MOU 2015 relationship between parties

I confirm that the language below and attached to the email below, as you proposed, is acceptable. Please provide an execution copy.

Best regards,

Kimberly

Kimberly Heimert

Vice President and General Counsel

OVERSEAS PRIVATE INVESTMENT CORPORATION

1100 New York Ave, NW

Washington DC 20527

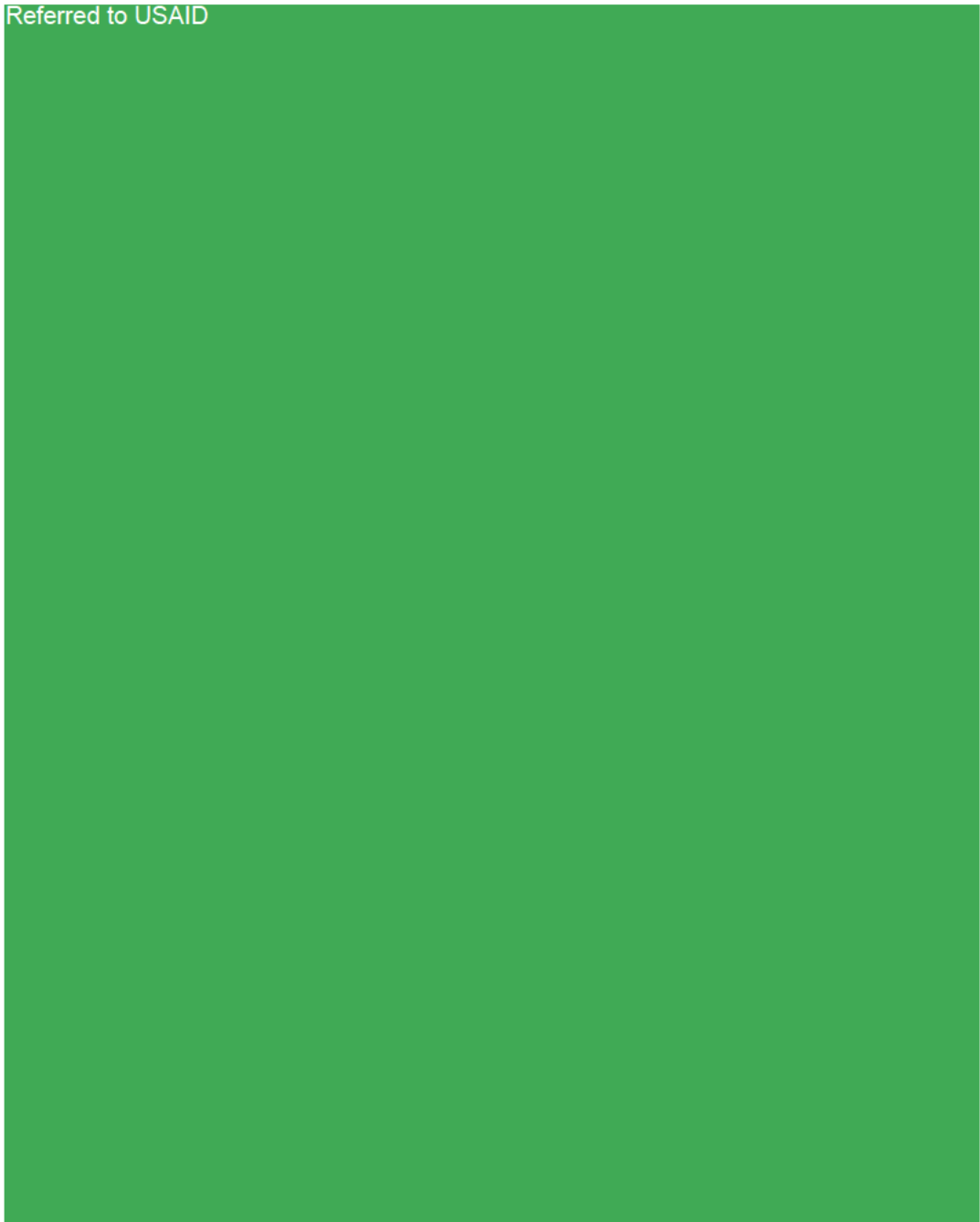
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(b) (6)

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Referred to USAID



From: Stubbs, Genevieve [mailto:(b) (6)]

Sent: Wednesday, February 03, 2016 10:12 AM

To: Miller, Lloyd (IG/A/AIG)

Cc: Webb, Tracey (SF/MD); Germak, Alison (SMEF); Day, Barbara; Kuhlow, Margaret (OIP/VP); Schweigart, Katherine (INS)

Subject: RE: New Auditor Training

Thank you, Lloyd. I will send over the presentations in advance (if they are ready). If not, we will bring them along on USB thumb drives. I anticipate we will have six speakers, being one each for our lines of business (Structured Finance, Small & Medium Enterprise Finance, Insurance, and Investment Funds) as well as one from our Office of Investment Policy and one to provide an overview. We will do our best to stay on time so the class can make it to their next event. I will be back in touch as the date draws closer.

Genevieve G. Stubbs

Sr. Administrative Counsel/ADAE0

Overseas Private Investment Corporation

1100 New York Ave. NW

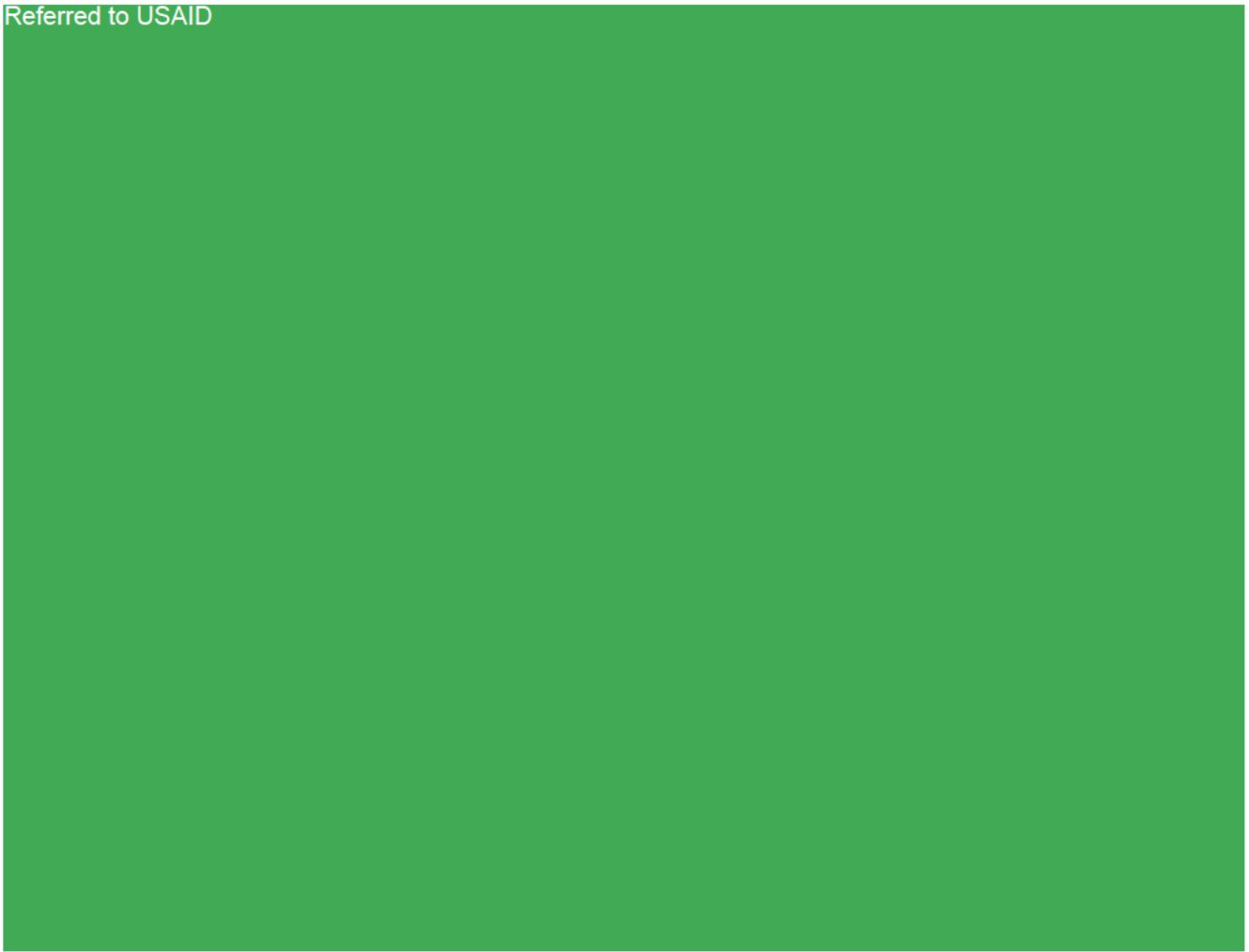
Washington, DC 20527 (b) (6)

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Referred to USAID



Referred to USAID



From: Stubbs, Genevieve [mailto:\(b\) \(6\)](#)

Sent: Monday, February 01, 2016 4:00 PM

To: Dempsey, Melinda (IG/A/AIG)

Subject: RE: New Auditor Training

We are putting together our presentation. As of right now, it looks like we would start at 9:00 and end at noon, including a brief break in the middle. I assume you will have a computer and projector for us to use? Do you have any idea how many people will be in the audience?

Genevieve G. Stubbs

Sr. Administrative Counsel/ADAEO

Overseas Private Investment Corporation

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O: (b) (6)

Referred to USAID



From: Stubbs, Genevieve [[mailto:](#)(b) (6)]

Sent: Wednesday, January 27, 2016 1:47 PM

To: Dempsey, Melinda (IG/A/AIG)

Subject: New Auditor Training

Melinda:

Sorry I missed your call this morning. I am telecommuting. I tried to call you back but missed. You may reach me on my cellphone at (b) (6) this afternoon, although I will be in a voice conference from 2:45 to 3:30 pm.

I am still working on getting speakers for the presentation, so the 12th is probably just as good as any other date. How long will our presentation part of the program be? If I can get presenters for each of the lines, OIP and finance, we would have at least four speakers and need about two hours. Is that acceptable for you?

What time would we be presenting?

Thanks.

Genevieve G. Stubbs

Sr. Administrative Counsel/ADAEO

Overseas Private Investment Corporation

1100 New York Ave. NW

Washington, DC 20527 (b) (6)

O: (b) (6)

From: [Littlefield, Elizabeth](#)
To: [Calvaresi-Barr, Ann \(IG/IO\)](#)
Cc: [Heimert, Kimberly](#)
Subject: OPIC and the USAID OIG
Date: Monday, February 01, 2016 10:34:56 AM

Dear Ann,

I very much enjoyed meeting with you and learning about your impressive career at GAO, DoT and now USAID. It was also very helpful to get a sense of the personal philosophy about oversight that will guide your leadership of the USAID Office of the Inspector General. We welcome your trust-based, partnership-oriented, and pragmatic approach as that is very much my leadership style as well.

As we discussed, I would welcome the chance to have you personally come and address OPIC's leadership team to help answer questions and share your perspectives on the role of OIG. I think it would be very valuable to have you address the audit committee of OPIC's Board of Directors as well. Thank you for so generously offering your time for this. I will ask my office to coordinate you with yours to arrange that.

As I said to you, we are pleased with the overall relationship between our two teams, and find that, for the most part, it is very constructive, collegial, pragmatic and results-focused. Moreover, as your team has gained a greater understanding of OPIC and our work, and my team has gained a greater understanding of the OIG's processes, that collaboration has become better rooted and stronger. Related to that, you raised one or two friction points that our respective teams have experienced in executing the OIG's oversight mandate at OPIC. I was glad we could so readily come to an understanding that best balances efficiency and effectiveness with the OIG understandable need for unfettered access. As we agreed, we all want the flow of information from OPIC to the OIG to be unfiltered and efficient and I commit to you that the OPIC teams will make every effort to make sure that is the case. As we discussed, I agree that your staff should feel free to pick up the phone to contact anyone at OPIC they want to contact, without necessarily bringing our PoC into the loop. As you suggested, OPIC staff can certainly inform our PoC, to the extent they decide to do so, of those conversations. At the same time, as a courtesy, and so that we can more efficiently track the data flows, when your OIG staff does makes a direct request in writing to my staff, I would expect them to simply copy our PoC.

Again, I much appreciated our conversation and look forward to our collaboration. And when we run into issues, which we inevitably will, I know we can rely on open and balanced communication between the two of us, if need be, to solve any matters coming our way.

Best,

Elizabeth

Elizabeth L. Littlefield

President & CEO

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Referred to USAID

From: Day, Barbara K. [mailto:(b) (6)]
Sent: Friday, April 25, 2014 3:41 PM
To: Brown, Justin (IG/IO)
Cc: Heimert, Kimberly; Jagadesan, Dev; Morton, John E.
Subject: FW: USAID IG/OPIC MOU for 2014

Dear Justin

I wanted to follow up and let you know that our new General Counsel, Kimberly Heimert, arrived this week. Going forward, Kimberly will be your point of contact at OPIC for purposes of the MOU discussions and implementation. Although I know that USAID OIG has not yet signed the attached MOU, please consider this as written notice of the change in POC pursuant to section 8 of the MOU. I am copying Kimberly on this message so that you have her contact information – her telephone number is (b) (6). If you would like a different format of notification, please let Kimberly know.

It has been a pleasure working with you and I hope we have a chance to meet in person at some point

Very best regards,

Barbara

Barbara K. Day

Associate General Counsel

Investment Funds

(b) (6) (O) | (b) (6)

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From: Day, Barbara K.
Sent: Monday, March 31, 2014 5:46 PM
To: 'Brown, Justin (IG/IO)'
Cc: Morton, John E.; Jagadesan, Dev
Subject: USAID IG/OPIC MOU for 2014

Dear Justin,

With apologies for the delay in responding, and following up on our most recent conversation as well as your earlier conversation with Dev Jagadesan, we believe that the language of the body of the MOU is acceptable to both USAID OIG and OPIC and that our differences relate to the scope of the Service Schedule: FY 2014, Attachment A.

However, we have taken a further look at the Service Schedule in view of the continued progress in Congress to provide OPIC with an agency-specific IG, and have made some further adjustments. As

you can see, we propose to rely on USAID OIG's services in way that is not duplicative of other oversight that is currently underway – or likely to be undertaken soon. At the same time, as a small agency, we are mindful of using our staff resources in the most efficient way we can, and expect that this is something that you, as an experienced IG would appreciate. Finally, given that we are mid-way through the fiscal year, that our financial auditors are beginning work, and that we are expecting a new permanent General Counsel to arrive in the next couple of weeks, we believe that the scope that we are now proposing is the most appropriate.

Based on this reasoning, our position with regard to each line on the Services Schedule is as follows:

1. IG oversight of FISMA audit and Fraud Awareness briefing provide value to OPIC.
2. QCR and oversight of Financial Statement Audit are not warranted in view of OPIC's statutory authorities regarding financial audit, Audit Committee oversight, and the fact that OPIC is likely to have a permanent DFE IG at some point during the 2014 audit period.
3. While further review of the Purchase Card Survey may be appropriate from your perspective, we are surprised at the relatively small adjustment in the cost estimate compared to what the full audit and related activities would be. However, we have retained this item.
4. We continue to believe that it is more appropriate for a full scale risk assessment to await appointment of a full time IG.
5. However, we agree that there could be benefit from an appropriately scaled performance audit, and are willing to consider your recommendations for a specific audit that can be completed by the end of the fiscal year.

We are returning to you an executed copy of the MOU covering the FISMA audit, Fraud Awareness briefing and Purchase Card Survey, so that those matters are covered by an appropriate arrangement, as you have started to do this work already. We very much appreciated the Fraud Awareness briefing last week. Thank you. We are open to having a conversation about recommendations for a performance audit and suggest that a good time for this may be the week of April 28, after our new General Counsel has arrived. We can amend the MOU to cover an performance audit, once agreed.

We believe that this type of arrangement is fully consist with the expectations of our Congress and are prepared to move forward in a way that makes the best use of our mutual resources.

Very best regards,

Barbara

Barbara K. Day

Acting General Counsel

(b) (6) (O) | (b) (6)

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Referred to USAID



From: [Hunt, Benjamin](#)
To: ["Davis, Marcelle \(IG/IO\)"](#)
Cc: [Morton, John E.](#); [Day, Barbara K.](#)
Subject: RE: Correspondence from OPIC's President and CEO, Elizabeth Littlefield
Date: Wednesday, April 09, 2014 10:21:57 AM
Attachments: [Letter to Board about USAID IG.pdf](#)

Marcelle,

Attached is the full copy. Apologies for the confusion. Thank you.

Best,

Benjamin Hunt

Special Assistant to the President & CEO

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Referred to USAID



From: Hunt, Benjamin [[\(b\) \(6\)](mailto:(b) (6))]
Sent: Wednesday, April 09, 2014 9:52 AM
To: Davis, Marcelle (IG/IO)
Cc: Morton, John E.; Day, Barbara K.
Subject: RE: Correspondence from OPIC's President and CEO, Elizabeth Littlefield

Dear Ms. Davis,

I was remiss in including an attachment to Ms. Littlefield's correspondence to Mr. Carroll. Please see the attached letter from OPIC's President and CEO, Elizabeth Littlefield, to OPIC's Board of Directors, as mentioned as being enclosed in the letter to Mr. Carroll.

The correspondence from Ms. Littlefield to Mr. Carroll is also attached once gain.

Thank you and please let me know if you have any questions.

Best,

Benjamin Hunt

Special Assistant to the President & CEO

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From: Hunt, Benjamin
Sent: Tuesday, April 08, 2014 6:54 PM
To: (b) (6)
Cc: Littlefield, Elizabeth; Day, Barbara K.
Subject: Correspondence from OPIC's President and CEO, Elizabeth Littlefield

Dear Ms. Davis,

Please see the attached correspondence from OPIC's President and CEO, Elizabeth Littlefield, in response to USAID's Acting Inspector General Michael Carroll's note on OPIC oversight.

Best,

Benjamin Hunt

Special Assistant to the President & CEO
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From: [Day, Barbara K.](#)
To: ["Brown, Justin \(IG/IO\)"](#)
Cc: [Morton, John E.](#); [Jagadesan, Dev](#)
Subject: USAID IG/OPIC MOU for 2014
Date: Monday, March 31, 2014 5:46:27 PM
Attachments: [USAID IG MOU.pdf](#)

Dear Justin,

With apologies for the delay in responding, and following up on our most recent conversation as well as your earlier conversation with Dev Jagadesan, we believe that the language of the body of the MOU is acceptable to both USAID OIG and OPIC and that our differences relate to the scope of the Service Schedule: FY 2014, Attachment A.

However, we have taken a further look at the Service Schedule in view of the continued progress in Congress to provide OPIC with an agency-specific IG, and have made some further adjustments. As you can see, we propose to rely on USAID OIG's services in way that is not duplicative of other oversight that is currently underway – or likely to be undertaken soon. At the same time, as a small agency, we are mindful of using our staff resources in the most efficient way we can, and expect that this is something that you, as an experienced IG would appreciate. Finally, given that we are mid-way through the fiscal year, that our financial auditors are beginning work, and that we are expecting a new permanent General Counsel to arrive in the next couple of weeks, we believe that the scope that we are now proposing is the most appropriate.

Based on this reasoning, our position with regard to each line on the Services Schedule is as follows:

1. IG oversight of FISMA audit and Fraud Awareness briefing provide value to OPIC.
2. QCR and oversight of Financial Statement Audit are not warranted in view of OPIC's statutory authorities regarding financial audit, Audit Committee oversight, and the fact that OPIC is likely to have a permanent DFE IG at some point during the 2014 audit period.
3. While further review of the Purchase Card Survey may be appropriate from your perspective, we are surprised at the relatively small adjustment in the cost estimate compared to what the full audit and related activities would be. However, we have retained this item.
4. We continue to believe that it is more appropriate for a full scale risk assessment to await appointment of a full time IG.
5. However, we agree that there could be benefit from an appropriately scaled performance audit, and are willing to consider your recommendations for a specific audit that can be completed by the end of the fiscal year.

We are returning to you an executed copy of the MOU covering the FISMA audit, Fraud Awareness briefing and Purchase Card Survey, so that those matters are covered by an appropriate arrangement, as you have started to do this work already. We very much appreciated the Fraud Awareness briefing last week. Thank you. We are open to having a conversation about recommendations for a performance audit and suggest that a good time for this may be the week of April 28, after our new General Counsel has arrived. We can amend the MOU to cover an performance audit, once agreed.

We believe that this type of arrangement is fully consist with the expectations of our Congress and are prepared to move forward in a way that makes the best use of our mutual resources.

Very best regards,

Barbara

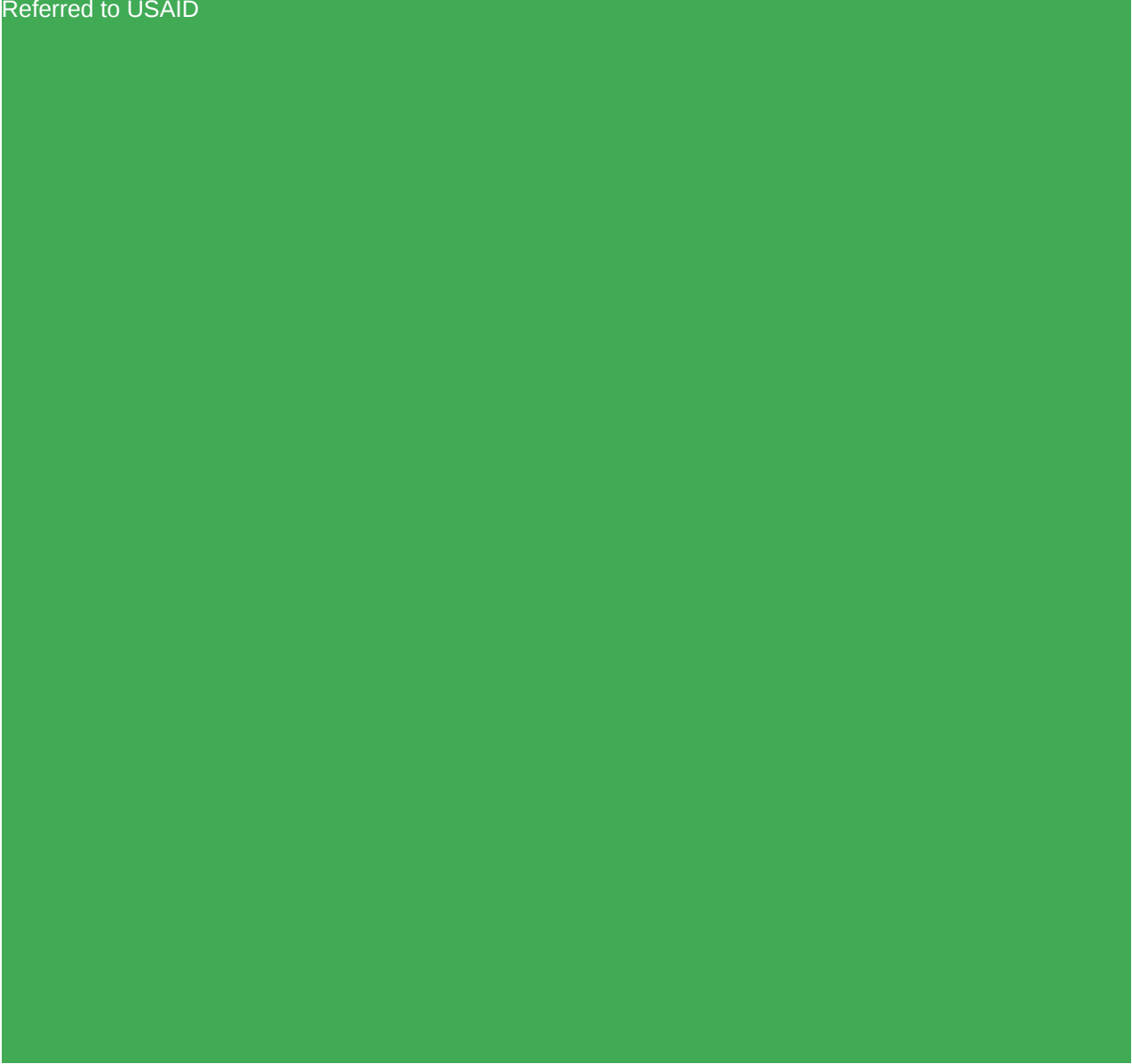
Barbara K. Day
Acting General Counsel

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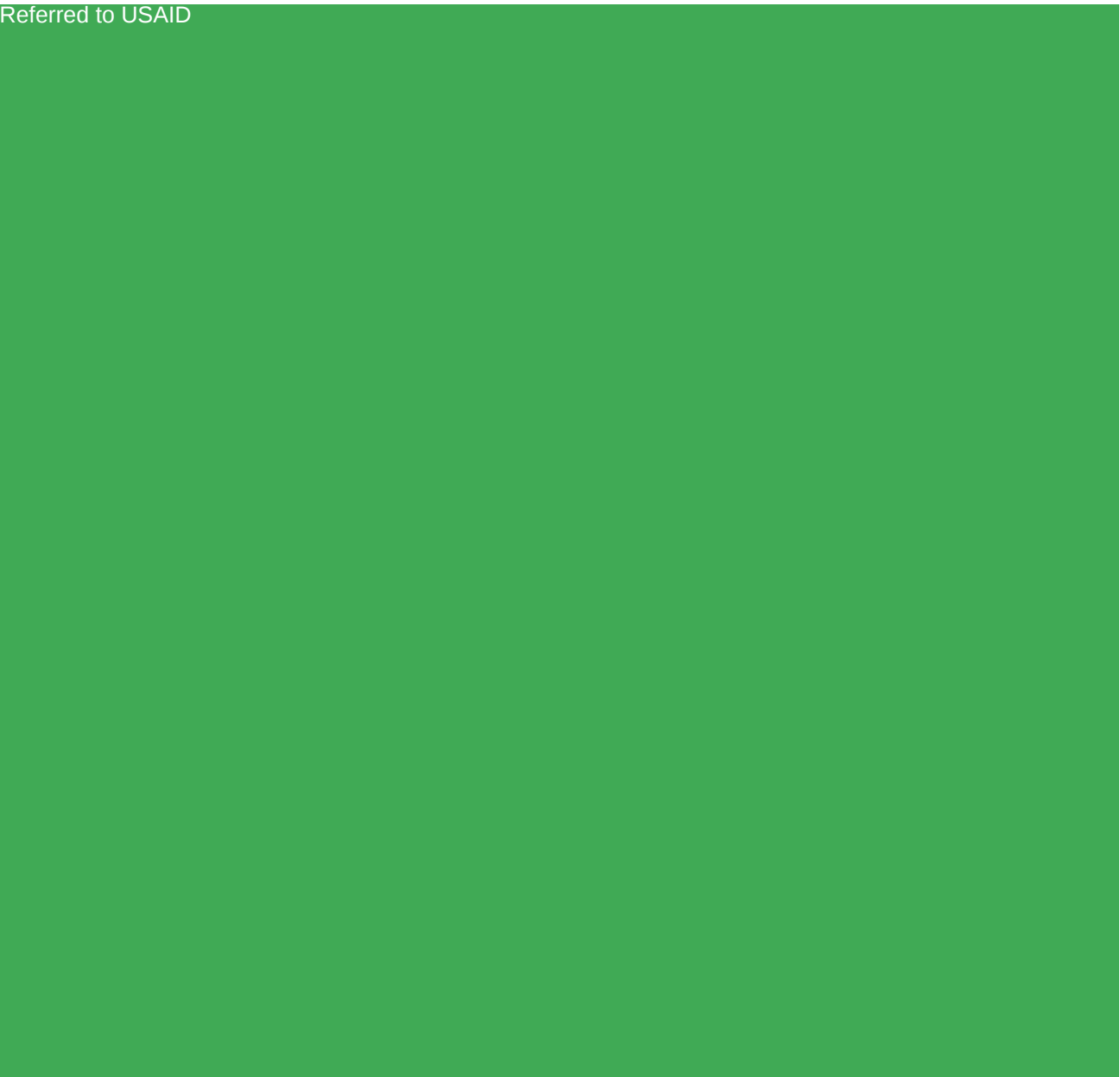
From: [Jagadesan, Dev](#)
To: [Brown, Justin \(IG/IO\)](#)
Cc: [Day, Barbara K.](#)
Subject: Re: Draft OPIC - USAID OIG FY 2014 MOU
Date: Friday, March 14, 2014 6:18:47 PM

Justin. Thanks sorry I did not get back to you today. A few brush fires needed to be put out around here and before I knew it the day was over. We will take a look at the changes. Dev

Referred to USAID



Referred to USAID



Referred to USAID



From: Day, Barbara K. [mailto:(b) (6)]

Sent: Friday, March 07, 2014 5:19 PM

To: Brown, Justin (IG/IO)

Cc: Jagadesan, Dev

Subject: FW: OPIC - USAID IG MOU

Justin,

Thank you for your email. I wanted to let you know that I will be on leave next week and am referring your email to our Associate General Counsel for Administration, Dev Jagadesan, to review in my absence.

Kind regards,

Barbara

Barbara K. Day

Acting General Counsel

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Referred to USAID



Referred to USAID



From: Day, Barbara K. [mailto:(b) (6)]

Sent: Wednesday, February 19, 2014 4:22 PM

To: Brown, Justin (IG/IO)

Cc: Littlefield, Elizabeth

Subject: OPIC - USAID IG MOU

Dear Justin,

Following up on our call and subsequent internal discussions, I am attaching OPIC's mark up of this year's MOU. The changes we are proposing are mostly reverting to the language we agreed upon last year. As to the substance of the services that OIG should provide this year we have the following comments. We think the FISMA audit and the Fraud Awareness briefing provide value to OPIC and have left those items in the MOU. With respect to the FISMA audit we note that it is more than 3 times the cost for 2013 and request a statement as to how this estimate was developed as the cost appears to be more than the cost of a GS-13, Step 10 for a full year.

With respect to the QCR and oversight of OPIC financial statements, OPIC's position is the same as last year in that such use of resources is not consistent with OPIC's statute. As you know, we have procured an Independent auditor in compliance with our statute, Government Auditing Standards,

and OPIC's Board level Audit committee oversight over the financial statements audit. Thus, we do not think such an additional review necessary or cost effective. Accordingly we have removed that line item.

As to the purchase card survey, OPIC just completed such a review of that program and considering the size of our Purchase Card program, this item would be duplicative of resources OPIC has already spent in this area. We would suggest OIG review the work recently completed by OPIC and we can have more discussions if in the OIG opinion more review is needed of OPIC's purchase card program.

At this time and based on where various pieces of legislation that would give OPIC a DFE IG we think any risk assessment should be completed by the OPIC DFE IG. A full scale assessment of OPIC is not necessary for the limited scope of the MOU. While auditing standards require analysis of risks during the planning phase of any performance audit, I am informed that assessment can be performed with respect to the subject matter of the performance audit. See sections 6.05 and 6.06 of GAO's Government Auditing Standards. Finally, as to the performance audit, OPIC requests that OIG provide guidance as to what areas it contemplates a performance audit for the purpose of not duplicating previous, or ongoing GAO reviews of OPIC.

Please let me know if you have any questions.

Thank you and very best regards,

Barbara

Barbara K. Day

Acting General Counsel

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Referred to USAID



From: Ellett, William [mailto:(b) (6)]

Sent: Tuesday, March 04, 2014 10:37 AM

To: Brown, Justin (IG/IO)

Cc: Morton, John E.; Giblin, Lori; Schmidt, Andrew (IG/IO); Day, Barbara K.

Subject: RE: OPIC IG Services for 2014

Justin,

The document that you received is a pdf binder document which contains all the documents mentioned in the email in one "binder." Each document in the binder is accessible by selecting the document from the listing on the left side of the screen when you open the binder. This is similar to selecting chapters when a pdf document has bookmarks which are also accessible on the left side of the screen.

Please try again and if you continue to have problems accessing the other files in the binder please feel free to give me a call and I will walk you through the process.

Thanks,

Bill Ellett

(b) (6)

Referred to USAID



From: Day, Barbara K. [mailto:(b) (6)]
Sent: Friday, February 28, 2014 4:29 PM
To: Brown, Justin (IG/IO)
Cc: Morton, John E.; Giblin, Lori; Ellett, William
Subject: OPIC IG Services for 2014

Dear Justin,

Thanks for your call yesterday afternoon. I wanted to follow up with you today and decided that the best way to start is an email addressing the three issues that were on my list from our prior call:

1. Purchase Card Survey.

You thought it would make sense for us to provide you with the information about OPIC's recent assessment of this for your review – and that you could then tell us whether you feel that additional work is needed, and if so, how much. In response to that request, I am attaching key work papers related to OPIC's Internal Control Program assessment of OPIC's charge card programs. Included are the Planning Document, write-ups of interviews with Agency Program Coordinators, testing worksheets, sampling plan, Notices of Findings and Recommendations and/or Notices of Final Actions (NFRs are not included if NFAs were issued), and the final memo reporting the results of the review to OPIC's President / CEO.

You may contact Bill Ellett or Lori Giblin with any questions at (b) (6) or Lori. (b) (6) (copied here).

2. Legislation providing for DFE IG?

This is HR 2548 - The Electrify Africa Act of 2013 that was reported out of committee yesterday (section 8 relates to OPIC). <http://foreignaffairs.house.gov/markup/markup-hr-2548-electrify-africa-act-2013>.

3. Management suggestions for an area where a performance audit could be helpful to the agency?

We offer the following suggestions:

- OPIC's compensation vs. mission comparable USG or private sector comparables. Is OPIC attracting and retaining the best resources or could we do better with a different payscale?
- Benchmarking OPIC's structure and competitiveness to serve US businesses in Africa against Chinese counterparts.
- Something related to an OPIC program in a specific sector, country or region (TBD).

I hope this is helpful. Please feel free to contact me to discuss further.

Regards,

Barbara

Barbara K. Day

Acting General Counsel

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Referred to USAID

From: Day, Barbara K. [mailto:(b) (6)]

Sent: Friday, February 28, 2014 6:10 PM

To: Brown, Justin (IG/IO)

Cc: Morton, John E.; Giblin, Lori; Ellett, William; Schmidt, Andrew (IG/IO)

Subject: RE: OPIC IG Services for 2014

Justin,

By this message, I am asking that Lori and/or Bill respond to your first question directly, as they provided the information to me, and I may have missed something.

With regard to the legislation, we have understood that the DFE IG language will be in the Senate counterpart of the Electrify Africa Bill, but we have not seen it, as I don't believe it has been released.

Regards,

Barbara

Barbara K. Day

Acting General Counsel

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Referred to USAID

From: Day, Barbara K. [mailto:(b) (6)]
Sent: Friday, February 28, 2014 4:29 PM
To: Brown, Justin (IG/IO)
Cc: Morton, John E.; Giblin, Lori; Ellett, William
Subject: OPIC IG Services for 2014

Dear Justin,

Thanks for your call yesterday afternoon. I wanted to follow up with you today and decided that the best way to start is an email addressing the three issues that were on my list from our prior call:

1. Purchase Card Survey.

You thought it would make sense for us to provide you with the information about OPIC's recent assessment of this for your review – and that you could then tell us whether you feel that additional work is needed, and if so, how much. In response to that request, I am attaching key work papers related to OPIC's Internal Control Program assessment of OPIC's charge card programs. Included are the Planning Document, write-ups of interviews with Agency Program Coordinators, testing worksheets, sampling plan, Notices of Findings and Recommendations and/or Notices of Final Actions (NFRs are not included if NFAs were issued), and the final memo reporting the results of the review to OPIC's President / CEO.

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I hope this is helpful. Please feel free to contact me to discuss further.

Regards,

Barbara

Barbara K. Day

Acting General Counsel

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From: [Day, Barbara K.](#)
To: (b) (6)
Cc: [Morton, John E.](#); [Giblin, Lori](#); [Ellett, William](#)
Subject: OPIC IG Services for 2014
Date: Friday, February 28, 2014 4:29:00 PM
Attachments: [OPIC Charge Card Review - Key Workpapers 2-24-2014.pdf](#)

Dear Justin,

Thanks for your call yesterday afternoon. I wanted to follow up with you today and decided that the best way to start is an email addressing the three issues that were on my list from our prior call:

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Regards,

Barbara

Barbara K. Day

Acting General Counsel

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From: [Day, Barbara K.](#)
To: (b) (6)
Cc: [Littlefield, Elizabeth](#)
Subject: OPIC - USAID IG MOU
Date: Wednesday, February 19, 2014 4:21:52 PM
Attachments: [MOU--USAID OIG and OPIC--OPIC markup 1-27 rev.docx](#)

Dear Justin,

Following up on our call and subsequent internal discussions, I am attaching OPIC's mark up of this year's MOU. The changes we are proposing are mostly reverting to the language we agreed upon last year. As to the substance of the services that OIG should provide this year we have the following comments. We think the FISMA audit and the Fraud Awareness briefing provide value to OPIC and have left those items in the MOU. With respect to the FISMA audit we note that it is more than 3 times the cost for 2013 and request a statement as to how this estimate was developed as the cost appears to be more than the cost of a GS-13, Step 10 for a full year.

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Please let me know if you have any questions.

Thank you and very best regards,

Barbara

Barbara K. Day

Acting General Counsel

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From: [De Amicis, Don](#)
To: [Brown, Justin \(IG/IO\)](#)
Cc: [Day, Barbara K.](#)
Subject: USAID IG/OPIC MOU
Date: Wednesday, January 15, 2014 6:38:29 PM

Justin,

I wanted to let you know that today is my last day as General Counsel here at OPIC. With the passage of the appropriations bills, there is now greater clarity regarding agency finances for FY 2014.

Barbara Day, whom I am copying, will be OPIC's acting General Counsel and will be your point of contact.

It was a pleasure working with you.

Best,

Don

Don Scott De Amicis
General Counsel
Overseas Private Investment Corporation
1100 New York Ave. NW
Washington DC 20527

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(b) (6)

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mobile